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*Attorneys for Charles M. Hallinan
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THOMAS W. MCNAMARA, as the Court-
Appointed Monitor for AMG Capital
Management, LLC; BA Services LLC; Black
Creek Capital Corporation; Broadmoor Capital
Partners, LLC; Park 269, LLC; C5 Capital
LLC; DF Services Corp.; DFTW Consolidated
[UC] LLC; Impact BP LLC; Level 5 Apparel
LLC; Level 5 Capital Partners LLC; Level 5
Eyewear LLC; Level 5 Motorsports, LLC;
Level 5 Scientific LLC; NM Service Corp.
(f/k/a/ National Money Service); PSB Services
LLC; Real Estate Capital LLC (f/k/a/ Rehab
Capital I, LLC); Sentient Technologies; ST
Capital LLC; Westfund LLC; Eclipse
Renewables Holdings LLC; Scott Tucker
Declaration of Trust, dated February 20, 2015;
West Race Cars, LLC; and Level 5
Management LLC; and their successors,
assigns, affiliates, and subsidiaries,

Plaintiff,

v.

CHARLES M. HALLINAN, an individual;
HALLINAN CAPITAL CORP., a Delaware
corporation; DOES I-X; and ROE
CORPORATIONS I-X,

Defendants.

Case No. 2:17-cv-02966-KJD-NJK

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANTS TO FILE
RESPONSIVE PLEADING TO
COMPLAINT**

(First Request)

1 Plaintiff, Court-Appointed Monitor Thomas W. McNamara ("Plaintiff"), by and through
2 his counsel, Michael F. Lynch of the Lynch Law Practice, PLLC and Edward Chang and Logan
3 Smith of McNamara Smith LLP and Defendants Charles M. Hallinan and Hallinan Capital Corp.
4 ("Defendants"), by and through their counsel, Jarrod L. Rickard of Semenza Kircher Rickard,
5 hereby stipulate to the following:

- 6 1. That the deadline for Defendants to file their responsive pleading to Plaintiff's
7 Complaint, filed on November 29, 2017, is currently scheduled on the Docket for
8 December 28, 2017;
- 9 2. That Defendants require additional time beyond the current deadline in light of the
10 following: (i) Defendants' undersigned counsel was only recently retained on or about
11 December 22, 2017; (ii) this matter involves novel issues of fact and law; (iii)
12 Defendants' counsel has pre-existing travel plans for the holidays; and (iv) Defendants'
13 counsel has other client commitments;
- 14 3. Therefore, Defendants shall have up to and including January 29, 2018 to file their
15 response to Plaintiff's Complaint.

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1 Dated this 29th day of December 2017.

2 SEMENZA KIRCHER RICKARD

3
4 /s/Jarrod L Rickard

Jarrod L. Rickard, Esq.
Nevada Bar No. 10203
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

7 *Attorneys for Charles M. Hallinan*
8 *and Hallinan Capital Corp.*

12 **IT IS SO ORDERED.**

14 
15 UNITED STATES MAGISTRATE JUDGE

16 Dated: January 2, 2018

Dated this 29th day of December 2017.

LYNCH LAW PRACTICE, PLLC

/s/ Michael F. Lynch

Michael F. Lynch (NV 8555)
3613 S. Eastern Ave.
Las Vegas, Nevada 89169

Logan Smith
(will comply with LR IA 11-2 within 10 days)
Edward Chang (NV 11783)
MCNAMARA SMITH LLP
655 West Broadway, Suite 1600
San Diego, California 92101

*Attorneys for Thomas W. McNamara, in his
capacity as Court-Appointed Monitor*